Status Update - Supplemental PCB Cleanup at Former City Scrap & Salvage
Paul Gallagher
to:
Kenneth Bardo
10/05/2012 09:44 AM
Cc:
"Oberster, Alan C.", "Knott, Charles J."
Hide Details
From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA,
Cc: "Oberster, Alan C." <alan.oberster@timken.com>, "Knott, Charles J." <charles.knott@timken.com>
History: This message has been replied to and forwarded.

1 Attachment

20121004-EPA Figure 2-2.pdf

Hi Ken,

This message includes our proposed approach to complete the supplemental PCB cleanup at the TSB Metal Recycling (TSB) property in Akron, Ohio. The attached figure depicts the status of the supplemental PCB cleanup, which is being performed to support the pending construction of a road by the City of Akron. To date, TSB has excavated and disposed of approximately 1,500 tons of soil, and the latest verification results suggest that the current approach to remove and dispose the residual PCB contaminated soils in the vicinity of the road is not viable.

The deed restriction for the original PCB cleanup by City Scrap and Salvage Co. (City Scrap) limits land use to industrial and commercial only, and requires that the property be secured by a fence. When City Scrap completed the original PCB cleanup, their perimeter fence secured the central and western portions of the property. The limited data obtained outside of the fenced area when the original PCB cleanup was completed indicated that PCB contamination did not extend beyond the fenced area.

Since the proposed road extends through the current fenced area, the supplemental PCB cleanup completed to date has focused on removing residual PCB contamination within the eastern-most portion of the fenced area. However, as shown on the attached figure, the recent analytical results indicate that the distribution of PCBs in soils extends beyond the current fenced area, into the eastern portion of the property. Based on our updated understanding of the distribution of residual PCB contamination at the property, it's no longer economically feasible to continue the current supplemental PCB cleanup approach.

We recommend for your consideration the following modified approach, which is based on the standard cleanup levels for a self-implementing PCB cleanup (40 CFR §761.61(a)(8)):

- Rather than constraining the supplemental PCB cleanup approach to manage soils based on the location of the existing fence area, the deed restriction will require: 1) a relocated fence to secure the metal recycling operations as described in the Soil Handling and Management Plan dated August 2012, and 2) high occupancy use will be prohibited in the area to the east of the relocated fenced area, where the proposed driveway and road will be built. Prohibiting high-occupancy use is consistent with the requirements for a cleanup under the self-implementing cleanup rules.

- Based on the self-implementing cleanup requirements for bulk remediation waste with low occupancy use, the remaining active cleanup activities to the east of the relocated fence will focus on the removal and off-site disposal of soils with residual PCB concentrations greater than 25 ppm (i.e., in the vicinity of test pit "f"). Post-excavation sampling will be performed to verify the removal of residual PCB contamination at concentrations greater than 25 ppm.

- During construction of the road, the soils located outside of the relocated fenced area with residual PCB concentrations between 1 ppm and 25 ppm will be managed and reused within the low-occupancy area. Please note that the proposed road grade extends more than 13 feet below the current ground surface elevation, and soils with PCB concentrations greater than 1 ppm will not be used as fill within the right-of-way for the road.

We can provide additional details once you have had a chance to review the data and considered the above approach.

Thank you for your assistance, and please contact me if you have any comments or suggestions.

Regards,

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
T 330.668.6506 C 330.705.0543
www.sanbornhead.com

From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]
Sent: Thursday, September 13, 2012 5:34 PM
To: Paul Gallagher
Subject: Re: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

paul, thanks for the updated figure depicting the areas of excavation for the PCB cleanup at the TSB Metals site. EPA comments on the August 16 workplan have been addressed. the work may proceed. please provide a summary report when the work is complete, including verification sampling and manifests for wastes disposed at the two landfills. ken

Paul Gallagher ---09/10/2012 04:45:58 PM---Hi Ken: The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesd

From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Oberster, Alan C." <alan.oberster@timken.com>

Date: 09/10/2012 04:45 PM
Subject: Updated Excavation and Disposal Plan - former City Scrap & Salvage Co.

Hi Ken:

The supplemental PCB Cleanup at the former City Scrap and Salvage site will begin on Wednesday. This message includes an updated soil excavation plan, which also summarizes the soil disposal program. Non-hazardous soil will be disposed of at Countywide Landfill, and hazardous waste soil (based on TCLP lead results for each excavation area) will be disposed of at Envirite of Ohio. In accordance with the *Supplemental PCB Assessment and Soil Management and Disposal Plan*, post-excavation sampling will be conducted at Areas B through E.

Please contact me if you have any questions or comments.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
T 330.668.6506 C 330.705.0543
www.sanbornhead.com

From: Paul Gallagher
Sent: Wednesday, August 29, 2012 3:00 PM
To: 'Kenneth Bardo'
Cc: Oberster, Alan C.; 'Knott, Charles J.'
Subject:

Hi Ken:

Here's a summary of our telephone conversation yesterday about the supplemental PCB cleanup at the former City Scrap & Salvage property in Akron, Ohio. Our responses to your four comments in your message below are:

1) Borings B618 and B619 were not associated with the supplemental PCB sampling outlined in our work plan dated July 11, 2012. These soil borings were contingency explorations for the petroleum hydrocarbon investigation near the former auto prep area. We archived the samples obtained from borings B618 and B619, pending the analyses of soil samples obtained from borings located closer to the former auto prep area. Since the total petroleum hydrocarbon concentrations in soils near the former auto prep area were favorable, there was no need to analyze additional samples from outbound borings B618 and B619.

2) At B616, the laboratory was unable to report a lower detection limit due to matrix interferences during the analyses, and the hold time expired before the lab could rerun the analysis. We resampled B616 last week, and the laboratory is currently analyzing a soil sample from this location. We're anticipating that the laboratory can achieve a lower detection (i.e., <1 ppm). The proposed excavation area will be adjusted if the concentration of PCBs at B616 is greater than 1 ppm.

3) The final report will provide the information requested below. As we discussed yesterday, some of the soil may be disposed of at a different landfill, because the TCLP lead concentration in the waste characterization composite sample was slightly greater than 5 milligrams per liter. Once the final disposal arrangements have been made, we

will provide a follow-up email that specifies which landfills will be used.
4) Arrangements are being made to install the fence before the road construction activities begin.

Also, the attached figure shows an updated excavation plan. The location of the proposed fence area has been modified to allow TSB Metals to extend the existing concrete pad further to the east. This change allows the size of Excavation Area A to be reduced. Fill soils generated during construction activities for the proposed concrete pad extension will be managed within the proposed fence area.

Based on your verbal approval to proceed with the supplemental cleanup during our conversation yesterday, we will begin the excavation activities once disposal arrangements are finalized.

In a forthcoming email, we will send a draft revised deed restriction for your review. The draft revised deed restriction will: describe the rational for modifying the existing deed restriction, identify the location of the fence for which inspection and maintenance will be required in the future, and establish new boundaries for the existing land use restriction (i.e., the right-of-way for the connector road will not be subject to the existing land use restriction). A final draft deed restriction will be included in the forthcoming final report.
Please contact me if you have any questions or comments. Thank you for your assistance.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
T 330.668.6506 C 330.705.0543
www.sanbornhead.com

From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]
Sent: Wednesday, August 22, 2012 12:41 PM
To: Paul Gallagher
Cc: Oberster, Alan C.; Knott, Charles J.
Subject: Re: FW: Former City Scrap - Connector Road

Paul, EPA has reviewed your letter of August 16th providing the *Supplemental PCB Assessment and Soil Management and Disposal Plan* for TSB Metals and Recycling, LLC located at 611 Wilbeth Road in Akron, Ohio. EPA provides the following comments:

- Explain why borings B618 and B619 were not sampled and analyzed.
- Sheet No. 2 of 3, Exhibit A reports PCB levels at 0 to 1 feet at B616 at <11.5 ppm. Has this data been validated and accepted? This detection limit is too high to confirm that PCBs are not present above cleanup levels. Conduct additional sampling to confirm PCB levels at this location.
- In the summary report, provide final verification results showing that Areas B, C, and D have been adequately remediated (i.e., PCBs <1 ppm). Also provide the completed manifests for disposal of approximately 900 cubic yards of PCB contaminated soil at the American Landfill in Waynesburg, Ohio.
- Ensure that the cut and fill activities associated with the proposed connector road do not impinge within the

proposed fence area where PCBs >1 pppm remain (at Borings B-123, B505, B507, B508, B608). Consider erecting the proposed relocated fence in this area before road construction activities to delineate the area not to be disturbed.

From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Knott, Charles J." <charles.knott@timken.com>, "Oberster, Alan C." <alan.oberster@timken.com>
Date: 08/16/2012 08:22 AM
Subject: FW: Former City Scrap - Connector Road

Hi Ken:

For your review and approval, this message includes a letter that summarizes the findings of recent soil sampling at the former City Scrap and Salvage property. The attached letter also includes the Soil Management and Disposal Plan associated with the proposed connector road. The City of Akron wants to begin construction activities in early September 2012, so that the connector road can be completed before the asphalt plants in northeast Ohio close for the winter season. We are proposing to complete supplemental PCB cleanup activities in late August, before the construction activities begin.

I will call you this morning to review the schedule and our proposed approach, which was previously outlined in our message below.

Thank you. We appreciate your help.

Paul
--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
T 330.668.6506 C 330.705.0543
www.sanbornhead.com

From: Paul Gallagher
Sent: Wednesday, July 11, 2012 12:15 PM
To: 'Kenneth Bardo'
Cc: 'Oberster, Alan C.'
Subject: FW: Former City Scrap - Connector Road

Hi Ken:

We're sending this message to summarize the upcoming supplemental soil sampling activities at the former City Scrap and Salvage property (Site). The attached Work Plan for Supplemental PCB Cleanup Activities is based on your message below and our follow-up telephone conversation. The objective of the supplemental soil sampling is to further develop our understanding of the distribution of PCBs in soils within the eastern portion of the fenced area, where the conditions of the prior PCB cleanup restricts how excavated soils can be managed. The findings of the

supplemental soil sampling will be the basis for our development of a Soil Management and Disposal Plan, which will be submitted for your approval.

The City is still working out some of the contracting issues for the road, but they hope to start the road construction later this summer. We have tentatively scheduled activities for the soil sampling to begin later this week, and we anticipate that we will complete the Soil Management and Disposal Plan for your review in early August.

Please contact me if you have any questions or comments regarding the soil sampling plan.

Thanks for your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
T 330.668.6506 C 330.705.0543
www.sanbornhead.com

From: Kenneth Bardo [mailto:Bardo.Kenneth@epamail.epa.gov]
Sent: Friday, June 22, 2012 6:30 PM
To: Paul Gallagher
Cc: Oberster, Alan C.
Subject: Re: Former City Scrap - Connector Road

paul, took a look at the info and offer the following observations.

- much of the cut-and-fill area for the connector road is outside of the restricted (fenced) area and does not require an action.
- the cut area within the restricted (fenced) area is not fully characterized for PCBs. the perimeter 7 samples have some detections both above and below 1 ppm and the 6 samples within the cut area all have detections below 1 ppm.
- EPA recommends that the eastern-half of the cut area within the restricted (fenced) area have a least 6 samples taken to confirm if PCB levels remain at <1 ppm at 0-2'.
- also, the western edge of the cut area adjacent to the new concrete pad should have at least 3 samples taken at 0-2' to see if PCB levels are >1ppm.
- based on these sample results, manage cut soils within the restricted (fenced) area accordingly. that is, soils with <1ppm PCBs can be used as fill. soils with PCBs >1ppm but <10 ppm can be managed onsite within the restricted (fenced) area if room is available or disposed of properly offsite if room is not available.
- the new fence may be placed at the perimeter of the cut area/edge of the new connector road feeding the new auto prep building.
- update Exhibit A and B of the deed restriction to define the new restricted area when work is complete.
- have a company representative onsite during the cut activities within the restricted (fenced) area to observe if anything unusual is encountered at depth (i.e., waste material, staining, etc.) that needs to be segregated and characterized to determine if it is appropriate fill material or should be properly disposed of offsite.

From: Paul Gallagher <pgallagher@sanbornhead.com>
To: Kenneth Bardo/R5/USEPA/US@EPA
Cc: "Oberster, Alan C." <alan.oberster@timken.com>
Date: 06/21/2012 04:11 PM
Subject: Former City Scrap - Connector Road

Hi Ken,

Thanks for calling me today. I have attached the updated figures that I mentioned. As we discussed, here's the key issues that we have identified regarding the proposed connector road through the western portion of the site:

1) The existing fence will need to be permanently moved before the connector road is built, and a portion of the site will become a public road. Therefore, the recorded deed restriction will need to be revised to recognize the following: 1) the new fence location and 2) the change in land use where the public road is located. When the proposed construction activities are finished, the City of Akron will acquire the property on which the connector road is located.

2) The road cut will require soils that are currently located within the fenced area to be reused as fill near the eastern end of the site. As shown on the attached figures, a portion of the excavated soils will have concentrations of PCBs greater than 1 ppm, so they will need to be managed appropriately.

3) The City of Akron wants to begin earthwork this summer, and we're trying to support their schedule.

It would be great if you could call me tomorrow to discuss the procedural issues that we should consider before committing to the City of Akron's proposed schedule. Once we have talked though the procedural issues (e.g., would this be a modification to the prior cleanup or would it need to follow the self-implement rules?) then we will provide a more detailed plan.

Thanks for your help.

Paul

--
Paul P. Gallagher, P.G., C.P.
Project Director

SANBORN | HEAD & ASSOCIATES, INC.

3770 Embassy Parkway, Suite 110, Fairlawn, OH 44333
T 330.668.6506 C 330.705.0543
www.sanbornhead.com

[attachment "20120605-Connector Road Historic PCBs-.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120816 USEPA Work Plan ltr.pdf" deleted by Kenneth Bardo/R5/USEPA/US] [attachment "20120910_Waste Profile-Disposal UPDATED.PDF" deleted by Kenneth Bardo/R5/USEPA/US]